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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,)	No. CR 20-70698 JCS
15)	
16 Plaintiff,)	STIPULATION AND PROPOSED ORDER
17 v.)	WAIVING TIME UNDER SPEEDY TRIAL ACT
18 SANDRA ANN ZUNIGA,)	AND RULE 5.1
19 Defendant.)	

1 With the agreement of the parties, and with the consent of the defendant, the Court enters this
2 order continuing the preliminary hearing date of September 24, 2020, at 9:30 a.m., to October 22, 2020,
3 at 9:30 a.m. and documenting the defendant's waiver of the preliminary hearing date under Federal Rule
4 of Criminal Procedure 5.1 and the exclusion of time under the Speedy Trial Act, 18 U.S.C. 3161(b).
5 This Court previously agreed to continue the date of the preliminary hearing and to exclude time under
6 the Speedy Trial Act through September 24, 2020.

7 The parties agree, and the Court finds and holds, as follows:

8 1. The defendant is currently charged by criminal complaint. The defendant is not in
9 custody, having been released on an unsecured bond of \$250,000 on June 10, 2020.

10 2. The defendant agrees to an exclusion of time under the Speedy Trial Act, 18 U.S.C.
11 3161(h)(7)(A) & (B)(iv) to provide reasonable time necessary for effective preparation, taking into
12 account the exercise of due diligence.

13 3. The defendant waives the time limits of Federal Rule of Criminal Procedure 5.1 for
14 preliminary hearing.

15 4. Counsel for the defense believes that postponing the preliminary hearing is in her client's
16 best interest, and that it is not in her client's interest for the United States to indict the case during the
17 timeline established in Rule 5.1.

18 5. The Court finds that, taking into the account the public interest in the prompt disposition
19 of criminal cases, these grounds are good cause for extending the time limits for a preliminary hearing
20 under Federal Rule of Criminal Procedure 5.1. Given these circumstances, the Court finds that the ends
21 of justice served by excluding the period from September 24, 2020 through October 22, 2020, outweigh
22 the best interest of the public and the defendant in a speedy trial. 18 U.S.C. 3161(h)(7)(A).

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DATED: September 22, 2020

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IT IS SO ORDERED.

DATED: September 22, 2020


HON. LAUREL BEELER
United States Magistrate Judge